

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

DAVID P. DONOVAN,

Plaintiff,

v.

BETH A. WILKINSON,

Defendant.

Civil Action No. 1:20-cv-1344

**UNOPPOSED MOTION TO FILE UNDER SEAL DEFENDANT'S
MEMORANDUM OPPOSING RECONSIDERATION**

Pursuant to Local Civil Rule 5(C), Defendant Beth Wilkinson, by undersigned counsel and without opposition from the plaintiff and intervenor, hereby moves to file her Memorandum Opposing Reconsideration under seal pending resolution of the currently pending sealing issues that are before Judge Davis.

Defendant is filing this motion because her Memorandum Opposing Reconsideration addresses text and subject matter that the Court either has ordered sealed or is considering ordering sealed. The memorandum itself should therefore be sealed in its entirety pending resolution of those underlying issues before the Court, after which time it can be redacted consistent with the Court's rulings.

Pursuant to Local Civil Rule 5(C), Defendant provides the following non-confidential description of the material that has been filed under seal: a memorandum responding to Intervenor Pro Football Inc.'s memorandum motion to reconsider sealing determinations made by Judge Davis.

Dated: April 6, 2021

Respectfully submitted,

Beth Wilkinson

By: /s/ Jared Paul Marx

Thomas G. Connolly (VA Bar No. 29164)

Thomas B. Mason (*pro hac vice*)

Jared Paul Marx (VA Bar No. 91213)

HARRIS, WILTSHIRE & GRANNIS, LLP

1919 M Street NW, 8th Floor

Telephone: (202) 730-1300

Fax: (202) 730-1301

tconnolly@hwglaw.com

tmason@hwglaw.com

jmarx@hwglaw.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused a true copy of this document to be served via ECF on all parties.

Dated: April 6, 2021

/s/ Jared Paul Marx

Jared Paul Marx